

**Thomas M. Kennedy (TK-0993)**  
**Susan M. Jennik (SJ-4607)**  
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**New York, NY 10003**  
**(212) 358-1500**

**Return Date:**  
**May 9, 2006**  
**10:00 a.m.**

**- and -**

**Hanan B. Kolko (HBK-1307)**  
**MEYER, SUOZZI, ENGLISH & KLEIN, P.C.**  
**1350 Broadway, Suite 501**  
**New York, NY 10018**  
**(212) 239-4999**

**Attorneys for International Union of Electronic,  
Electrical, Salaried, Machine and Furniture Workers,  
Communications Workers of America (IUE-CWA)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:**

**In re DELPHI CORPORATION, et al.,**

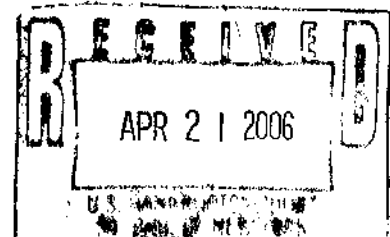
**Debtors.**  
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**05-44481 (RDD)**  
**(Jointly Administered)**

**OBJECTION OF IUE-CWA TO MOTION FOR ORDER  
UNDER 11 U.S.C. § 1113(c) AUTHORIZING REJECTION OF COLLECTIVE  
BARGAINING AGREEMENTS AND UNDER 11 U.S.C. § 1114(g)  
AUTHORIZING MODIFICATION OF RETIREE WELFARE BENEFITS**

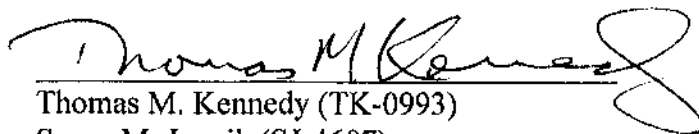
IUE-CWA objects to the motion of Delphi Corporation ("Delphi") for an Order under 11 U.S.C. §§ 1113(c) and 1114(g) authorizing it to reject the IUE-CWA's collective bargaining agreements and to terminate post retirement benefits for the reasons set forth in the accompanying Memorandum of Law and respectfully states as follows:



1. Delphi has failed to meet its obligation to bargain in good faith with IUE-CWA and its Local Unions prior to the hearing on this motion.
2. Delphi has offered so-called alternative proposals that fail to meet the definite offer standards of 11 U.S.C. § 1113(c) and federal labor law.
3. Delphi has failed to provide sufficient information about how its proposals impact on the specific manufacturing facilities that the IUE-CWA represents as it is required to do under 11 U.S.C. § 1113(c).
4. The IUE-CWA had good cause to not accept Delphi's proposals for many reasons, including their inapplicability to IUE-CWA plants, Delphi's failure to provide critical information necessary to evaluate these proposals, and Delphi's ability to restore IUE-CWA facilities to profitability without undergoing the enormous disruption caused by these proposals.
5. Delphi's proposal to the IUE-CWA is neither fair nor equitable and in fact requires IUE-CWA members to assume a highly disproportionate share of the sacrifices necessary to restore this company to profitability.
6. Delphi's proposal concerning retiree health and life insurance does not provide for any continuing Delphi responsibility in the event General Motors Corporation substantially reduces or fails to continue such coverage.

Dated: New York, New York  
April 21, 2006

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Thomas M. Kennedy", written over a horizontal line.

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